

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

BCI ACRYLIC, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:23-CV-908-JPS
v.)	
)	Hon. Judge J.P. Stadtmueller
MILESTONE BATH PRODUCTS, INC.)	
<i>d/b/a</i> BELLASTONE BATH SYSTEMS)	
and TIGHTSEAL LLC,)	
)	
Defendants.)	

**RULE 12(b)(1) NOTICE OF MOTION AND MOTION
TO DISMISS FOR LACK OF SUBJECT MATTER JURISDICTION**

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that Defendants, Milestone Bath Products, Inc. *d/b/a* Bellastone Bath Systems and Tightseal LLC (collectively “Milestone”), by and through their attorneys K&L GATES LLP, and before the Honorable Judge J.P. Stadtmueller of the United States District Court for the Eastern District of Wisconsin, hereby submit their Motion to Dismiss for Lack of Subject Matter Jurisdiction pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure. The grounds for this motion are set forth in the accompanying memorandum in support and evidence attached thereto.

MEET AND CONFER CERTIFICATION

I hereby certify that on September 6, 2023, the parties to the instant action met and conferred telephonically, and the Parties were unable to resolve the issues without the Court's intervention. The parties submitted an Executive Summary on September 28, 2023 (Dkt. 21) and the Court ordered limited discovery to conclude by December 1, 2023 and authorized the filing of this motion (Dkt. 22).

Date: December 1, 2023

Respectfully submitted,

By: /s/ Ketajh Brown

Ketajh Brown

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***Attorneys for Defendants Milestone Bath Products
Inc. and TightSeal LLC***

CERTIFICATE OF SERVICE

I hereby certify that on December 1, 2023, I caused a true and correct copy of this Notice of Motion to be served upon counsel of record as of this date by filing same through the Court's CM/ECF system.

/s/ Ketajh Brown